

PAUL HASTINGS

1(212) 318-6751
jodikleinick@paulhastings.com

November 26, 2014

VIA ECF FILING

Honorable Paul A. Crotty
United States District Court Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl St., Courtroom 11D
New York, NY 10007-1312

SPECIALLY APPEARING

Re: *Dragon State International Limited v. Keyuan Petrochemicals, Inc., et al.*, No. 1:14-cv-08591-PAC

Dear Judge Crotty:

We write on behalf of defendant Aichun Li in connection with the matter referenced above. Ms. Li respectfully requests an extension of time for her response to the summons and complaint, which is currently due December 2, 2014. This is Ms. Li's first request for an extension of time.

Preserving all defenses and objections, including any defenses and objections based on the assertion that the Court lacks personal jurisdiction over her, Mr. Li requests that her time to answer, move or otherwise respond to the summons and complaint be extended through and until January 12, 2015, which is the same date that responses are due from defendants Keyuan Petrochemical, Inc. and Chunfeng Tao. Plaintiff's counsel has agreed that plaintiff does not oppose Ms. Li's request for an extension of time.

Respectfully submitted,

/s/Jodi A. Kleinick

Jodi A. Kleinick
of PAUL HASTINGS LLP

cc: All counsel of record.

APPROVED & SO ORDERED

DATED: _____

Honorable Paul A. Crotty